

September 16, 2020 1:45 PM  
CLERK OF COURT  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
BY: ilg /        SCANNED BY:        /       

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
Southern Division**

AVERY C. THOMPSON SMITH Plaintiff,  
(proposed pseudonym)

**1:20-cv-901**

**Robert J. Jonker  
Chief United States District Judge**

VS.

CITY OF LANSING MICHIGAN, AMY L.

CASTILLO, City of Lansing Police officer,

INGHAM COUNTY BOARD OF

COMMISSIONERS, DOES 1-22, ERIC A.

SCHERTZING, Ingham County Treasurer,

CAITLIN BUDZINSKI, Ingham County Police

officer,

DEFENDANTS

**EXPEDITED CONSIDERATION  
REQUESTED**

**PLAINTIFF'S MOTION TO PROCEED  
USING PSEUDONYM AND PROTECTIVE ORDER**

Plaintiff- "AVERY C. THOMPSON SMITH" (proposed pseudonym) ,  
requests this case proceed using pseudonym, and request this Court restrict the disclosure of  
Plaintiff's identity to parties other than Defendants and Defendants' legal counsel.

**MOTION TO PROCEED UNDER PSEUDONYM-V. INGHAM COUNTY, CITY OF LANSING - 1**

1 Should the Court grant Plaintiff's motion, and permit Plaintiff to proceed by pseudonym,  
2 the entry of a protective order will be necessary to protect the disclosure of Plaintiff's identity  
3 during the course of discovery and in submissions to the Court which may become part of the  
4 public record.  
5

6 For this reason, Plaintiff requests leave to file a proposed protective order with the Court  
7 upon the issuance of a decision on this motion in Plaintiff's favor. Plaintiff is, further, amenable  
8 to conferring with Defendants prior to submission of the proposed protective order to determine  
9 if the parties can agree to the proposed terms.  
10

11  
12 Respectfully submitted,

13 *M. C. Thompson Smith* *pseudonym*  
14 *M. C. Thompson Smith*  
15 Plaintiff AVERY C. THOMPSON SMITH  
16 (proposed pseudonym)

17 Date: Sept 16, 2020  
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